

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

SHAWN JOSEPH,

Plaintiff,

vs.

GENESIS COIN, INC.; GENESIS  
SERVICES, INC.; AQUARIUS  
MANAGEMENT CORP.; and EVAN  
ROSE,

Defendants.

Civil Action No. 1:22-cv-00615-RP

**DECLARATION OF WILLIAM ODOM  
IN SUPPORT OF MOTION TO REMAND TO STATE COURT**

I, William Odom, hereby declare:

1. I am an attorney licensed to practice in the State of California and admitted in good standing to practice in the Western District of Texas. I am an Attorney at The Vora Law Firm, P.C., counsel for Plaintiff in this matter. I make this declaration in support of Plaintiff Shawn Joseph's Motion to Remand to State Court, or in the Alternative, for Leave to Take Expedited Jurisdictional Discovery. I make this declaration of my own personal knowledge, except as otherwise noted, and if called as a witness, I could and would testify competently to all of the following.

2. Attached as **Exhibit 2** is a true and correct copy of a webpage hosted by the Delaware Secretary of State, showing information about the registered entity “Genesis Coin Inc.,” accessed on July 20, 2022.

3. Attached as **Exhibit 3** is a true and correct copy of a Statement and Designation by Foreign Corporation filed by Genesis Coin, Inc. with the California Secretary of State on May 4, 2015.

4. Attached as **Exhibit 4** is a true and correct copy of a Certificate of Surrender of Right to Transact Intrastate Business filed by Genesis Coin, Inc. with the California Secretary of State on November 17, 2015.

5. Attached as **Exhibit 5** is a true and correct copy of an Application for Registration of a Foreign For-Profit Corporation filed by Genesis Coin, Inc. with the Texas Secretary of State on November 22, 2016,

6. Attached as **Exhibit 6** is a true and correct copy of a 2017 Texas Franchise Tax Public Information Report filed by Genesis Coin, Inc. with the Texas Secretary of State on April 6, 2017.

7. Attached as **Exhibit 7** is a true and correct copy of a 2018 Texas Franchise Tax Public Information Report filed by Genesis Coin, Inc. with the Texas Secretary of State on February 19, 2018,

8. Attached as **Exhibit 8** is a true and correct copy of a 2019 Texas Franchise Tax Public Information Report filed by Genesis Coin, Inc. with the Texas Secretary of State on February 18, 2019,

9. Attached as **Exhibit 9** is a true and correct copy of a webpage hosted by the State Department of Puerto Rico, displaying search results that appear for “Genesis Coin,” accessed on July 21, 2022,

10. Attached as **Exhibit 10** is a true and correct copy of a 2020 Texas Franchise Tax Public Information Report filed by Genesis Coin, Inc. with the Texas Secretary of State on February 18, 2020.

11. Attached as **Exhibit 11** is a true and correct copy of a 2021 Texas Franchise Tax Public Information Report filed by Genesis Coin, Inc. with the Texas Secretary of State on March 15, 2021.

12. Attached as **Exhibit 12** is a true and correct copy of a screen capture of the LinkedIn profile of Peter Sentwoski, <https://www.linkedin.com/in/psentowski/>, accessed on July 25, 2022.

13. Attached as **Exhibit 13** is a true and correct copy of a Certificate of Registration filed by Aquarius Management Corp. with the Puerto Rico Department of State on December 1, 2016.

14. Attached as **Exhibit 14** is a true and correct copy of a Certificate of Incorporation of a Stock Corporation filed by Aquarius Management Corp. with the Puerto Rico Department of State on December 1, 2016.

15. Attached as **Exhibit 15** is a true and correct copy of a webpage hosted by the Delaware Secretary of State, showing information about the registered entity “Genesis Services, Inc.,” accessed on July 20, 2022.

16. Attached as **Exhibit 16** is a true and correct copy of a webpage hosted by the State Department of Puerto Rico, displaying search results for entity “Genesis Services” accessed on July 25, 2022. Genesis Services, Inc. is not among the search results.

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17. Attached as **Exhibit 17** is a true and correct copy of an email exchange between Michael J. O'Leary, counsel for Defendants, and myself taking place between July 6, 2022 and July 22, 2022, which is meet-and-confer correspondence pertaining to Mr. Joseph's motion.

I declare under penalty of perjury of the laws of the United States (28 U.S.C. § 1746) that the foregoing is true and correct to the best of my knowledge.

Executed on July 25, 2022

By: William M. Odom